Appendix A

HAZARDOUS WASTE CHECKLIST

NOTE: Violation of any of the below may result in a Notice of Deficiency (NOD) issued by the Environmental Management Division (EMD) and/or a Notice of Violation (NOV) issued by the Pennsylvania Department of Environmental Protection (PADEP). Refer all questions regarding hazardous waste to the Environmental Management Division at x6560. Post a copy of this checklist near your approved hazardous waste accumulation area.

BEFORE WASTE GOES IN DRUM:

- Obtain spill pallet for liquid wastes.
- Obtain standard Government pallet in new or very good condition with no cracks or protruding nails.
- Obtain a new drum that has been approved for your waste.
- Stencil drum with Proper Shipping Name, Cost Center, and Accumulation Date.
- Complete Hazardous Waste label using indelible marker and apply to drum.
- Apply proper Hazard Class label to drum.
- Enter drum information into the HW Tracking System. Update record when drum is full and when drum is shipped to DRMO.

WHILE WASTE IS ACCUMULATING:

- Keep drum tightly sealed at all times unless waste is being placed in the drum.
- Gather waste first, then open drum. If the drum is open and waste is not being added, it is a violation.
- Lever-lock rings and drum rings must fit securely and must not be bent.
- Never put anything other than the specified waste in the drum.
- Do not fill the drum higher than six inches from the top.
- Only drums of like hazards can go on the same pallet.
- **Waste must be removed from the shop within 45 days** from the accumulation date unless extension of the accumulation period is granted from EMD.
- Check integrity of seal prior to shipment.

A-1

Appendix B

CLASS I OZONE DEPLETING SUBSTANCES

Common Name	Trade Name	Chemical Name	Chemical Formula
Group I			
CFC-11	R-11	Trichlorofluoromethane	$CFCl_3$
CFC-12	R-12	Dichlorodifluoromethane	CF_2Cl_2
CFC-113	Freon-113 R-113	Trichlorotrifluoroethane	$C_2F_3Cl_3$
CFC-114	R-114	Dichlorotetrafluoroethane	$C_2F_4Cl_2$
CFC-115	R-115	Monochloropentafluoroethane	C_2F_5Cl
Includes:	All isomers of the above chemicals		
Group II			
Halon-1211	N/A	Bromochlorodifluoromethane	CF_2ClBr
Halon-1301	N/A	Bromotrifluoromethane	CF_3Br
Halon-2402	N/A	Dibromotetrafluoroethane	$C_2F_4Br_2$
Includes:	All isomers of the above chemicals		
Group III			
CFC-13	R-13	Chlorotrifluoromethane	CF_3Cl
CFC-111	N/A	Fluoropentachloroethane	C_2FCl_5
CFC-112	N/A	1,1,2,2-Tetrachloro 1,2-difluoroethane	$C_2F_2Cl_4$
CFC-211	N/A	1,1,1,2,2,3,3-Heptachloro 3-fluoropropane	C_3FCl_7
CFC-212	N/A	1,1,1,2,2,2-Hexachloro 2,2-difluoropropane	$C_3F_2Cl_6$
CFC-213	N/A	1,1,1,2,2-Pentachloro 2,2,3-trifluoropropane	$C_3F_3Cl_5$
CFC-214	N/A	1,1,1,3-Tetrachloro 2,2,3,3-tetrafluoropropane	$C_3F_4Cl_4$
CFC-215	N/A	1,1,1-Trichloro 2,2,3,3,3-pentafluoropropane	$C_3F_5Cl_3$
CFC-216	N/A	1,2-Dichloro 1,1,2,3,3,3-hexafluoropropane	$C_3F_6Cl_2$
CFC-217	N/A	1-Chloro 1,1,2,2,3,3,3-heptafluoropropane	C_3F_7Cl
Includes:	All isomers of the above chemicals		
Group IV			
N/A	N/A	Carbon Tetrachloride	CCl_4

Appendix C

AIR POLLUTION SOURCE CONTROL
MAINTENANCE ACTIVITIES

Use in accordance with TYAD Reg 200-1; Proponent Office is AMSEL-TY-RK-E

BUILDING LOCATION _____ DATE _____

PAINT BOOTH _____ SANDBLAST CABINET _____

UNIT TYPE _____ MODEL # _____

MANHOURS _____ REG TIME _____ OVERTIME _____

WORK PERFORMED (AS APPROPRIATE):

CHANGED PANEL FILTERS _____

CHANGED FILTER CURTAIN _____

EMPTIED DUST COLLECTOR _____

OTHER MAINTENANCE (PLEASE EXPLAIN)

_____

_____

COMMENTS _____

_____

_____

NOTE: SEND COMPLETED COPY TO THE ENVIRONMENTAL MANAGEMENT DIVISION, ATTN: AIR PROGRAM MANAGER, MAIL STOP 5086.

AMSEL-TY-RK-E Form 3203-R, 1 APR 98

C-1

Appendix D

NON-REGULATED WASTE RULES

1. Upon first drop of waste in drum:

Apply Non-regulated Waste label. Using indelible marker. write the following on the label:

(a) Your Cost Center
(b) Exact contents of drum, including identification as a solid or liquid
(c) Date you put the waste in drum (accumulation date)

USE BUNG-TYPE DRUMS FOR LIQUIDS, OPEN TOP FOR SOLIDS

2. Non-regulated wastes will be shipped to DRMO within 90 days from the accumulation date. If you need more than 90 days, contact EMD

3. Use only new drums unless EMD approves the use of a previously used drum.

4. Keep drums tightly sealed at all times.

5. **NEVER PUT ANYTHING OTHER THAN SPECIFIED WASTE IN DRUM!**

6. **NEVER FILL LIQUID WASTES MORE THAN 6 INCHES FROM THE TOP.**

7. If you must store solid waste outside, storage drums will be placed on new or like new pallets, covered with plastic, and checked weekly for signs of drum corrosion and pallet deterioration. Non-regulated liquid wastes stored outside will be placed on a spill pallet in addition to a wooden pallet and the entire pallet and drum(s) will be covered with plastic.

8. Enter a record for your waste into the HW Tracking System.

HW Tracking System Instructions:
a. Log into **HPT520A**
b. Type **haz.shop** [ENTER]
c. Select **ADD/UPDATE WASTE**
d. Select **ADD RECORD** for adding new waste or **QUERY RECORD** for updating an existing record
e. Complete all fields **except DATE SHIPPED DRMO** for new records
f. Hit the **ESC** key once to record the record
g. Type **E** to exit until you see the $ prompt
h. Type (simultaneously) **Ctrl d**
i. After waste is picked up, complete **"DATE SHIPPED DRMO"** field.

11. **DON'T GUESS ON ANYHING!! CALL EMD IF YOU AREN'T SURE AT X5-6560**

Appendix E

REMINDER TO SUPERVISORS RECEIVING REASSIGNED/BORROWED EMPLOYEES:

Insufficient employee training is the number one deficiency cited by OSHA under the HAZCOM standard. These citations come with stiff penalties and fines. Several laws REQUIRE you to provide training to your employees upon their initial assignment or under other circumstances, as when a new hazard is introduced. Some of these requirements are:

- All operations in the shop where hazardous chemicals are present and what health and safety hazards they pose.

- How and where to obtain and safely store hazardous materials.

- Where the shop's MSDS book is located and how MSDSs are filed in it.

- Location and requirements of TYAD Reg. 200-4 -- Written Hazard Communication Program.

- Purpose and location of the Spill Plan.

- How to recognize different alarms.

- Location of fire extinguishers and phones.

- Location of eye lavage/emergency shower and how to use them.

- Evacuation plan for the area and the procedure to shut down operations.

- Personal Protective Equipment (PPE) Training, including:

    - What type and when PPE is necessary
    - The limitations of the PPE
    - How to don, doff, adjust, and wear PPE
    - Care, maintenance, useful life, inspection, cleaning, disinfecting, repair, storage, and disposal of PPE.

- What to do in the event of a spill.

- What are the potential emergency situations related to hazardous materials in the shop.

- Whom to notify in the event of a hazardous substance release.

Other considerations:

Does the employee require a physical exam, special PPE, Lead/Cadmium/Asbestos Awareness Training?

If you require assistance training your employees, please call the Environmental Management Division, the Safety Division, or the Industrial Hygiene Office.

E-1

Appendix F

SPILL REPORTING PROCEDURES

In the event of a hazmat spill in any amount or spill of POL onto the ground or water, notify the fire department, X7300, or in the event of an emergency X911. Provide the following information:

1. Incident building number and location.

2. Alternate access points.

3. Name of individual reporting the incident.

4. Quantity, type, and amount of material released.

5. Number and type of injuries, if any.

6. Whether a fire or explosion is involved or imminent.

7. Environmental conditions at the site.

8. Brief description of the events leading to the incident and any obvious threatening effects.

9. Summary of the control actions taken, if any, or underway to combat the spill.

10. The type of assistance needed.

11. Arrangements for contacting or keeping in contact with the reporting party.

APPENDIX G

Universal Waste Management of Mercury-Bearing Lamps

1. Use original boxes to package spent lamps, in particular 'U'-shaped, round, compact fluorescent, and other odd shaped lamps. If original boxes are not available for 4' and 8' lamps, obtain alternate packaging from the disposal contractor.

2. Using indelible marker, write the following on the container:

(1) Your Cost Center
(2) "Used Lamps"
(3) Date you put the waste in the container (accumulation date)
(4) Number of lamps in the container.

3. Spent lamps will be shipped to DRMO within 275 days from the accumulation date. If more time is needed, contact the Environmental Management Division (EMD), X5-6560.

4. Keep containers tightly sealed at all times.

5. NEVER PUT ANYTHING OTHER THAN SPECIFIED WASTE IN CONTAINER!

6. Containers will not be stored outside. Boxes and containers will be stacked neatly on new or like new pallets and secured prior to movement. The containers will be handled in a way that prevents breakage.

7. Enter a record for your waste into the HW Tracking System.

HW Tracking System Instructions:
a. Log into **HPT520**
b. Type **haz.shop** [ENTER]
c. Select **ADD/UPDATE WASTE**
d. Select **ADD RECORD** for adding new waste or **QUERY RECORD** for updating an existing record
e. Complete all fields **except DATE SHIPPED DRMO** for new records
f. Hit the **ESC** key once to record the record
g. Type **E** to exit until you see the **$** prompt
h. Type (simultaneously) **Ctrl d**
i. After waste is picked up, complete **"DATE SHIPPED DRMO"** field.

APPENDIX C

Hazardous Waste Inventory

TABLE A-1
Hazardous Waste Inventory

Component Painting Division (Bldg 1A - 5H200)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
W25JNEP125	Thinner rags	Waste Flammable Solid, NOS	D001,D035, F003,F005	UN1325	4.1	III	9504
W25JNEP126	Paint	Waste Paint	D001, D035 F003, F005	UN1263	3	II	9502
	Paint gun cleaner	Waste Paint Related Material	D001, D018 D035, D039 D040, F003, F005	UN1263	3	II	

Mobile Equipment Refinishing Division (Paint) (Bldg 9 - 5H300)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
W25JNEP125	Thinner rags	Waste Flammable Solid, NOS	D001, D035 F003, F005	UN1325	4.1	III	9504
W25JNEP126	Paint	Waste Paint	D001, D035 F003,F005	UN1263	3	II	9502
	Paint gun cleaner	Waste Paint Related Material	D001, D018 D035, D039 D040 F003, F005	UN1263	3	II	

Finishing and Etching Division (Electroplating) (Bldg 1A - 5H400)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
W25JNEX057	Wash Water from 1A Baghouse	Hazardous Waste Liquid, NOS	D006, D009	NA3082	9	III	9402
W25JNEX058	Olive drab iridite	Hazardous Waste Liquid, NOS	D006, D007 D008	NA3082	9	III	9402
W25JNEX059	Iridite rags	Waste Corrosive Solid, Acidic, Inorganic, NOS	D007	UN3261	8	II	9404
W25JNEX060	Sodium Dichromate	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Nitric Acid)	D002, D007	UN3264	8	II	9202
W25JNEX061	Copper Bags & Debris	Hazardous Waste Solid, NOS	D006	NA3077	9	III	9404
W25JNEX062	Brite dip	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Sulfuric, Nitric Acid)	D002, D006 D007, D010	UN3264	8	II	9202
W25JNEX063	Cadmium filter tubes	Waste Corrosive Solid, Acidic, Inorganic, NOS (H2SO4)	D006	UN3261	8	II	9404
W25JNEX064	Cadmium filter tubes	Waste Corrosive Liquid, Acidic, Inorganic, NOS (Sulfuric Acid)	D002, D006	UN3264	8	II	9202
W25JNEX065	Zinc phosphate	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Nitric, Phosphoric Acid)	D002, D006	UN3264	8	II	9202
W25JNEX066	Turco Sludge	Hazardous Waste Liquid, NOS	D004, D006 D008, D010	NA3082	9	III	9402
W25JNEX067	Cadmium solution	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Sulfuric Acid)	D002, D006	UN3264	8	II	9202
W25JNEX068	Hydrochloric acid	Waste Hydrochloric Acid, Solution	D002, D006 D007, D008	UN1789	8	II	9202

Finishing and Etching Division (Electroplating) (Bldg 1A - 5H400)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
W25JNEX069	Carbon	Waste Corrosive Solids, NOS	D006	UN1759	8	III	9404
W25JNEX070	Zinc phosphate sludge	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Nitric, Phosphoric Acid)	D002, D006	UN3264	8	II	9202
W25JNEX071	Zincate (Aluminal)	Waste Corrosive Liquid, Basic, Inorganic, NOS (Sodium Hydroxide)	D002, D006 D007, D008	UN3266	8	II	9202
W25JNEX072	Cad Babs & Debris from Cad Tank	Hazardous Waste Solid, NOS	D006	NA3077	9	III	9404
W25JNEX073	Floor Mats	Hazardous Waste Solid, NOS	D006,D007	NA3077	9	III	9404
	Sulfuric acid (anodize)	Analysis required for turn-in					
	Black dye	Analysis required for turn-in					
	Bronze iridite	Analysis required for turn-in					
	Ferric chloride	Analysis required for turn-in					
	Black magic oxide	Analysis required for turn-in					
	Nickel strip	Analysis required for turn-in					
	Copper solution	Analysis required for turn-in					

Finishing and Etching Division (Electroplating) (Bldg 1A - 5H400)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
	Ferlon strip	Analysis required for turn-in					
	Nickel filters	Analysis required for turn-in					
	Aluminum etch	Analysis required for turn-in					
	Epoxy paint stripper	Analysis required for turn-in					
	Silver bath solution	Analysis required for turn-in					
	Silver bath filter tubes	Analysis required for turn-in					
	Aluminum anodize	Analysis required for turn-in					
	Nickel solution	Analysis required for turn-in					
	Lye (small tank)	Analysis required for turn-in					
	Pit sludge	Analysis required for turn-in					
	Silver bath filter tubes	Analysis required for turn-in					
	Aluminum iridite	Analysis required for turn-in					
	Anodize red dye	Analysis required for turn-in					

Finishing and Etching Division (Electroplating) (Bldg 1A - 5H400)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
	Anodize blue dye	Analysis required for turn-in					
	Alkaline rust remover	Analysis required for turn-in					
	Silver carbon sludge	Analysis required for turn-in					
	Sodium hydroxide solid	Analysis required for turn-in					
	Alkali sludge	Analysis required for turn-in					
	Tin solution	Analysis required for turn-in					
	Polish cleaner	Analysis required for turn-in					
	Neutralizer	Analysis required for turn-in					
	Anodize gold dye	Analysis required for turn-in					
	Epoxy rinse water	Analysis required for turn-in					

Fiber Optic/Cable Division (Photo Fab) (5GH00)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
W25JNEPF55	Fluoboric acid solution	Waste Fluoroboric Acid Solution	D002	UN1775	8	II	9202
W25JNEPF56	Ultra etch fine line	Waste Caustic Alkali Liquid, NOS (Copper Chloride)	D002	UN1719	8	III	9202
W25JNEPF57	Catalyst 9F	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Hydrochloric Acid)	D002, D008	UN3264	8	II	9202
W25JNEPF58	Accelerator 19 (fluoboric acid, 10%)	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Fluoboric Acid)	D002	UN1760	8	II	9202
W25JNEPF59	Fluoboric copper solution	Waste Corrosive Liquids, Acidic, Inorganic, NOS (Fluoboric, Boric Acid)	D002, D008	UN3264	8	II	9202
W25JNEPF60	Electroless copper solution	Waste Corrosive Liquids, Basic, Inorganic, NOS (sodium hydroxide)	D004, D010	UN3266	8	II	9402
	Tin lead solution	Analysis required for turn-in					
	Rosin flux	Analysis required for turn-in					
	Hydrochloric acid (w/ultra etch fine line)	Analysis required for turn in					
	Hydrochloric acid, 10%	Analysis required for turn-in					
	Sulfuric acid, 10%	Analysis required for turn-in					
	Sodium persulfate solution	Analysis required for turn-in					
	Solder wave oil	Analysis required for turn-in					
	Sulfuric acid, 18%	Analysis required for turn-in					
	Etcho strip	Analysis required for turn-in					
	T-Strip	Analysis required for turn-in					

US Army Medical Maintenance Activity (W25AT5)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZ CLASS	PACKING GROUP	CLIN
	Sandblast filters	Hazardous Waste Solid, NOS	D006	NA3077	9	III	9404
W25AT5007	Sandblast grit	Hazardous Waste Solid, NOS	D006	NA3077	9	III	9404

COMSEC Support Services Division (5N500)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZARD CLASS	PACKING GROUP	CLIN
W25JNEP125	Thinner rags	Waste Flammable Solid, NOS	D001, D035 F003, F005	UN1325	4.1	III	9504
W25JNEP126	Paint	Waste Paint	D001, D035 F003,F005	UN1263	3	II	9502
	Paint gun cleaner	Waste Paint Related Material	D001, D018 D035, D039 D040 F003, F005	UN1263	3	II	
W25JNECM04	Sandblast Grit	Hazardous Waste Solid, NOS	D006,D007	NA 3077	9	III	9404

Equipment Management Division

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZARD CLASS	PACKING GROUP	CLIN
	Oil separator sludge	Analysis required for turn-in					
	Diesel and water	Analysis required for turn-in					
	Water and gasoline	Analysis required for turn-in					
	Pit sludge	Analysis required for turn-in					

Utilities Division (Pretreatment Plant) (3A800)

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZARD CLASS	PACKING GROUP	CLIN
W25JNEPT13	Sulfide sludge	Hazardous Waste Solid, NOS	D006, F006	NA 3077	9	III	9534
W25JNEPT14	Sand (sulfide)	Hazardous Waste Liquid, NOS	D006	NA 3082	9	III	9402
W25JNEPT15	Sand (sulfide)	Hazardous Waste Solid, NOS	D006	NA 3077	9	III	9404

Other

PROFILE #	TYPE OF WASTE	PROPER SHIPPING NAME	EPA HAZ WASTE #	UN/NA #	HAZARD CLASS	PACKING GROUP	CLIN
Lithium3	Lithium batteries	Waste Water Reactive Solid, NOS	D003	UN 2813	9	II	9304
	Spill clean up	varies	varies				
	Expired material	varies	varies				
W25JNEAB02	Xylene Stripper	Waste Xylene	D001	UN1307	3	II	9102
W25JNECL02	X-Ray Developer	Hazardous Waste Liquid, NOS	D004	NA3082	9	III	9402
W25JNEEM64	Fixer Solution	Hazardous Waste Liquid, NOS	D004, D010 D011	NA3082	9	III	9402
W25JNEPM11	Oil & Debris	Non-Regulated Solid Waste					9904
W25JNEPM12	Oil & Debris	Non-Regulated Liquid Waste					9902
Alkalbat2	Alkaline Batteries	Non-regulated Solid waste					9904
Alkmercbat2	Alkaline Batteries containing Mercury	Waste Batteries, dry, containing Potassium Hydroxide, Electric Storage	D009	UN3028	8	III	9404
Asbestos6	Waste Asbestos	Waste Asbestos		UN2212	9	III	9904
Asbestos7	Waste Floor Tiles	Waste Asbestos		UN2212	9	III	9904
Carbzincba	Carbon - Zinc Batteries	Non-Regulated solid Waste					9904
Glycol1	Waste Antifreeze	Non-Regulated Liquid					9902
Latex2	Waste Latex Paint	Non-regulated Liquid					9902
Magnesbat2	Waste Magnesium Batteries	Hazardous Waste Solid, NOS	D007	NA3077	9	III	9404
Nicad-Dry2	NiCad Batteries	Waste Batteries, Dry, Containing Potassium Hydroxide	D006	UN3028	8	III	9404
W25JNESM03	Machine Oil Solube 35	Non-Regulated Liquid					9902

APPENDIX D

SOP
For the
Industrial Waste Water Treatment Plant

Utilities Division
Directorate of Public Works
Tobyhanna Army Depot
Tobyhanna, Pennsylvania 18466-5078

STANDARD OPERATING PROCEDURE
NO. 1

11 January 2000

DAILY STANDARD OPERATING PROCEDURE (SOP) FOR THE INDUSTRIAL WASTEWATER TREATMENT PLANT

1. Purpose and Scope: This procedure assigns responsibilities and gives procedures to be followed by Utility Division personnel for daily inspections of the Industrial Wastewater Treatment Plant (IWTP).

2. Policy: The IWTP will be inspected each operational day.

3. Definitions: IWTP is defined as the treatment process used for treating plating rinsewater, photo fabrications rinsewater, and steam room rinsewater. The facility is located on the east platform of Building 1B, Bay 1.

4. Responsibilities and Procedures:

a. Operating personnel will perform the following inspections on a weekly basis. The inspection form will be filled out on the depot intranet at the following addess: http://147.221.100.92/npdes/iwtpinspect.htm. This is a secure form and is only accessible from the IWTP or Sewage Treatment Plant work stations (see enclosure). The following items will be inspected:

(1) Check all transfer pumps and holding tanks for proper operation utilizing the Facility Environmental Management and Monitoring System (FEMMS) user interface.

(2) Observe pH and Oxidation Reduction Potential (ORP) readings utilizing FEMMS for possible indication of problems in the treatment process.

(3) Observe and monitor all indicating warning lights and alarms.

(4) Check and inspect each chemical feed pump for sufficient feed rate and operating condition.

(5) Observe and monitor process steps to ensure proper treatment.

(6) Prepare and replenish each chemical solution to ensure a sufficient supply is available.

(7) Maintain all pumps, valves, mixers, and tanks in proper operational status.

(8) Check and inspect sludge press and sludge dehydrator for proper operation. Ensure waste is properly contained and labeled for removal.

(9) Check and inspect all safety and emergency equipment to ensure that all equipment is in operational condition. Operators must practice safety precautions and procedures in event of leaks/spills and when handling hazardous materials.

(10) Inspect all fixtures and equipment in treatment unit for any evidence of potentially hazardous conditions and correct as necessary.

(11) Check and inspect building, access doors, storage areas, treatment room, and ensure areas are secured from any unauthorized personnel.

(12) Practice good housekeeping, understand, and strictly adhere to all instructions and recommendations for the hazardous waste treatment facility, Safety Program, and Pennsylvania Department of Environmental Protection (PADEP) regulations.

(13) Record in the Daily Operating Log and Weekly Inspection Sheet all information of equipment failures, repairs, and remedial actions taken in operation of the facility.

(14) Check and inspect complete treatment unit for evidence of cracks, leaks, and potential failure - repair as required.

(15) Ensure sufficient supply of spill cleanup materials are present.

(16) Spill Containment Areas - Check and inspect condition of diking for any evidence of cracking or deterioration.

(17) Fire Extinguishers - Check and inspect for proper type and charge.

(18) Check for proper operation of the telephone system.

(19) Check and inspect all chemical stocks for leaching or deterioration of containers.

b. Operating personnel will wear required safety equipment at all times.

Enclosure

Michael Gutknecht
Chief, Utilities Division
Directorate of Public Works

IWTP Weekly Inspection

Items for Inspection	SAT	UNSAT	Problems Observed and Actions Taken
Security of Doors	☐	☐	
Odors or Fumes Detected or Observed	☐	☐	
Evidence of Leaks	☐	☐	
Containers Sealed	☐	☐	
Drums Labeled	☐	☐	
Monitoring Equipment	☐	☐	
Safety/Emergency Equipment	☐	☐	
Operating Equipment	☐	☐	
Fixtures/Seams	☐	☐	
Structural Equipment	☐	☐	
Sufficient Spill Material	☐	☐	
Concrete/Spill Containment	☐	☐	
Fire Extinguishers	☐	☐	
Telephone	☐	☐	
Proper Signs	☐	☐	

Click this button to send your inspection sheet: Submit

Click this button to reset the inspection form: Reset

[Home] [Up]

IWTPform v1.00

APPENDIX E

SOP
For the
Disposal of PCB Capacitors
From the
COMSEC Facility

Directorate Communications
Security Systems
Tobyhanna Army Depot
Tobyhanna, Pennsylvania 18466-5110

Standing Operating Procedure
No. 71

14 February 2000

Daily Standing Operating Procedure (SOP) for the Disposal of PCB (polychlorinated biphenyls) Articles from the COMSEC Facility

1. Purpose. This SOP assigns responsibilities and provides procedures to be followed for proper storage, labeling, handling, and disposal of PCB articles from demilled/declassified Communications Security (COMSEC) equipment.

2. Scope. This SOP applies to the disposal, storage, labeling, and handling of PCB articles from demilled/declassified COMSEC equipment within the COMSEC Systems Directorate. All capacitors and transformers (articles) manufactured prior to 01 January 1980 are assumed to contain PCB unless it has been proven that they do not.

3. Policy. The COMSEC Systems Directorate will ensure that the packaging, handling, and transportation of PCB articles is accomplished as follows:

a. All personnel involved with the packaging, handling, and transportation of PCB capacitors will be properly trained and certified as required by the Code of Federal Regulations, Title 40 (40 CFR) and 29 CFR.

b. Protective clothing and equipment will be used by employees as outlined in TYAD Regulation 385-1.

4. Responsibilities. The disposal of PCB articles from demilled/declassified COMSEC equipment is under control of several Divisions of the COMSEC Systems Directorate. Supervisors of the COMSEC facility where PCB articles are collected for disposal will:

a. Provide sufficient containers for the collection of PCB articles within their areas. Chosen container locations shall not create a dangerous situation or be in violation of federal laws/regulations. They will provide container locations to the Environmental Management Division (EMD).

b. Ensure that containers are properly packed, marked, secured, and labeled in accordance to the Department of Transportation (DOT) and Toxic Substance Control Act (TSCA) regulations and other applicable federal laws/regulations.

c. Maintain a current Material Safety Data Sheet (MSDS) on PCB for review/consultation.

d. Track PCB articles through the process stream from removal through turn-in.

e. Ensure PCB articles are packaged and transported according to procedures provided in paragraph 5 below.

5. Procedures. The COMSEC Division generating PCB articles for disposal will:

a. Obtain DOT approved containers (e.g., drums) by requisition through Depot Property Division. Approved containers are Performance Oriented Packaging with UN markings (e.g., UN 1A2/X250/S/92/USA).

b. Stencil drums with at least 1-inch lettering in a color contrasting to the drum color on three sides with "COMSEC" and "PCB (capacitors/transformers/articles as appropriate)". This drum can only be used for a maximum of nine months (270 days).

c. At the time the drum is first being filled, affix a TSCA PCB label, a blue Non-RCRA label, and a hazard class label to the container according to instructions provided by Environmental Management Division (EMD).

d. Keep waste container(s) closed at all times (except when adding to container). For the purpose of this SOP "closed" means the lid or cover must be on and secured with a ring and bolt or by other means to prevent spillage if the container is knocked over.

e. Close and seal filled containers. Stencil "out of service" date on drum.

f. Contact Environmental Management Division, x6461 or x6560 for record input into Hazardous Waste (HW) tracking system and generation of DD Form 1348-1a. Since the suspected PCB articles are hermetically sealed, they are specifically excluded from PCB analysis. If they have been tested, then the test results will be attached to the DD 1348-1a. This includes the name, type, method, and result of the screening. In addition, the name and signature of the person administering the test must be included. If there is any evidence of leaking from the capacitors, this will be treated as a spill and coordinated with the installation's spill response team (X5-7300 for non-emergencies, X911 for emergencies). These leaking or damaged articles must be repackaged in containers (overpacks) that meet required packing for PCBs. These overpacks must also be properly marked.

g. Disposal facilities must receive the PCB articles with 90 days or more remaining in the one-year time limit.

h. Place drums on standard pallets in good condition for transportation. Only drums with compatible contents will be placed on the same pallet. No more than three 55-gallon drums will be placed on a pallet and secured for handling and storage. PCB articles will not be stored outside.

6. References.

a. Toxic Substance and Control Act (TSCA)

b. CFR 40, Part 761

c. CFR 49, Part 172

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